

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**ELISABETH CLEVELAND, AMY LARCHUK, CHRISTOPHER REDMON, DHAVAL SHAH, and THOMAS MCCORMICK**, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

WHIRLPOOL CORPORATION,

Defendant.

**CASE NO. 20-cv-1906-WMW-JFD**

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES,  
LITIGATION COSTS, AND SERVICE AWARDS**

In accord with the Settlement Agreement and Release (ECF No. 71) (the “Settlement Agreement”) and this Court’s Preliminary Approval Order (ECF No. 75) (the “Preliminary Approval Order”), Plaintiffs Elisabeth Cleveland, Amy Larchuk, Christopher Redmon, Dhaval Shah, and Thomas McCormick (“Plaintiffs” or “Settlement Class Representatives”) and Class Counsel respectfully request that this Honorable Court: (i) award Plaintiffs’ Counsel attorneys’ fees of \$1,456,002.33, which is an amount equal to 6.5%-8.6% of the \$16,905,729-\$22,528,201 value of benefits to the Settlement Class, and which represents a 1.75 lodestar multiplier; (ii) award Plaintiffs’ Counsel reimbursement of litigation costs of \$33,997.67; and (iii) award service awards in the amount of \$2,500.00 to each of the Settlement Class Representatives.

In the Court's Preliminary Approval Order, this Court preliminarily approved the proposed settlement, conditionally certified the Settlement Class, and directed that the notice be sent to the Settlement Class Members informing them of the terms of the Settlement and their rights with respect thereto. As set forth in the Declaration of Harper Segui and Rachel Soffin, which is being filed concurrently herewith, the notice program by the Court has been implemented as ordered.

For the reasons set forth herein and in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Award of Award of Attorney's Fees, Litigation Costs, and Service Awards, and Declaration of Harper Segui and Rachel Plaintiffs and Plaintiffs' Counsel respectfully request that this Court (i) award Plaintiffs' Counsel attorneys' fees of \$1,456,002.33, which is an amount equal to 6.5%-8.6% of the \$16,905,729-\$22,528,201 value of benefits to the Settlement Class, and which represents a 1.75 lodestar multiplier; (ii) award Plaintiffs' Counsel reimbursement of litigation costs of \$33,997.67; and (iii) award service awards in the amount of \$2,500.00 to each of the Settlement Class Representatives.

As set forth in the accompanying memorandum of law, for judicial efficiency, Plaintiffs request that the Order on this motion be consolidated with an Order on Plaintiffs' forthcoming motion for final approval of the class settlement, for which Class Counsel will provide a detailed proposed final order.

Dated: February 24, 2022

Respectfully submitted,

/s/ Rachel Soffin  
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*Attorneys for Plaintiffs and the Settlement Class*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the foregoing was served upon all counsel of record via this Court's CM/ECF system.

This 24<sup>th</sup> day of February, 2022.

Respectfully submitted,

/s/ Rachel Soffin  
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